



THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

MICHAEL DAVID SILLS )  
and MARY SILLS, )  
 )  
Plaintiffs, )  
 )  
v. )  
 )  
SOUTHERN BAPTIST CONVENTION, )  
et al. )  
 )  
Defendants. )

CASE NO. 3:23-cv-00478  
JUDGE WILLIAM L. CAMPBELL, JR.  
Magistrate Judge Chip Frensley  
JURY TRIAL DEMANDED

**DEFENDANT JENNIFER LYELL’S MOTION FOR  
EXTENSION OF TIME TO RESPOND TO DISCOVERY**

Defendant Jennifer Lyell hereby asks this Court for additional time to respond to the interrogatories and document production requests, up to and including June 21, 2024. In support of such motion, undersigned counsel represents as follows:

1. Plaintiffs, David and Mary Sills did not propound a set of interrogatories to Jennifer Lyell until April 24, 2024. Plaintiffs submitted a set of document production requests to Defendant Jennifer Lyell by email April 25, 2024.
2. The interrogatories submitted are very broad and burdensome, with twenty-four questions and multiple subparts, seeking information covering the last twenty years or longer. The document production requests were very broad and burdensome, with twenty-four categories of documents seeking information for an equally lengthy time period.
3. On May 21, 2024 undersigned counsel called counsel for Plaintiffs’ to request an extension of time to respond to these outstanding discovery requests. Defendant requested an

additional 30 days, but at that time Plaintiffs' counsel was only willing to give an extension until June 7, which was two weeks for the interrogatories and slightly less than that for the document production requests. Plaintiffs' counsel advised that the June 7 date needed to be the first extension date because of Plaintiffs' response to similar requests by other Defendants. She told Defendant Lyell's counsel that she would be willing to consider a further extension if it was needed. Defendant's counsel accepted the more limited extension based upon that representation.

4. The additional time is needed. Defendant's counsel has made substantial progress towards answering the interrogatories. As explained to Plaintiffs' counsel, yesterday, Defendant Ms. Lyell works a full-time job and is not able to devote much time during the regular work week to assist her counsel and Defendant's counsel have had other litigation related deadlines that have taken (and continue to take) time away from these tasks in this case.

5. Despite the original expressed willingness to consider an additional extension, Plaintiffs' counsel is now unwilling to agree to the requested extension. Counsel for Defendant Ms. Lyell certifies that they have attempted in good faith to resolve these issues, but because of the approaching deadline and Plaintiffs' counsel's lack of agreement, this motion must be filed.

6. For these reasons, undersigned counsel asks for an extension of time of two weeks, up to and including June 21, 2024 to respond to the outstanding discovery requests propounded by Plaintiffs' to Defendant, Jennifer Lyell.

Respectfully submitted,

**NEAL & HARWELL, PLC**

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*Counsel for Defendant Jennifer Lyell*

### **CERTIFICATE OF SERVICE**

I hereby certify that on this the 7th day of June 2024, the foregoing was served via the court's electronic filing system on the following counsel of record:

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/s/ Ronald G. Harris

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